

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,

Case: 2:23-cr-20160  
Judge: Cox, Sean F.  
MJ: Patti, Anthony P.  
Filed: 03-14-2023

v.

DAMOND STRONG,  
  
Defendant.

**Violations:**  
18 U.S.C. § 1344  
18 U.S.C. § 1028(a)(7)

\_\_\_\_\_ /

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**COUNTS ONE AND TWO**

**18 U.S.C. § 1344(2)**

**BANK FRAUD**

On or about the dates set forth below, in the Eastern District of Michigan, the defendant, DAMOND STRONG, did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, and to obtain money and funds owned by and under the custody and control of said financial institution, by means of materially false and fraudulent pretenses and representations, that is pretenses and representations that he was victim J.L. withdrawing funds from Comerica Bank trust accounts of which J.L. was the lawful beneficiary,

and did obtain money and funds in the approximate amounts listed below by those pretenses and representations, all in violation of 18 U.S.C. § 1344(2), and with each transaction constituting a separate count of this Information:

<b>Count</b>	<b>Date of Withdrawal</b>	<b>Approximate Amount Obtained</b>
1	August 22, 2018	\$9,000.00
2	August 24, 2018	\$79,882.00

### **COUNTS THREE AND FOUR**

#### **18 U.S.C. § 1028(a)(7)**

#### **IDENTITY THEFT**

On or about the dates set forth below, in the Eastern District of Michigan, the defendant, DAMOND STRONG, did knowingly transfer, possess, or use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, bank fraud in violation of 18 U.S.C. § 1344(2), and as a result of the offense, the defendant or any other individual committing the offense, obtained

anything of value aggregating \$1,000 or more during any 1 year period, all in violation of 18 U.S.C. § 1028(a)(7), and with each instance constituting a separate count of this Information:

<b>Count</b>	<b>Date of Withdrawal</b>	<b>Means if Identification</b>
3	August 22, 2018	Name of victim J.L.
4	August 24, 2018	Name of victim J.L.

### **FORFEITURE ALLEGATIONS**

The allegations contained in Counts One and Two of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A). Upon conviction of the offense(s) charged in Counts One and Two of this Information, in violation of Title 18, United States Code, Section 1344, defendant shall forfeit to the United States any property which constitutes or is derived from proceeds obtained directly or indirectly, as a result of such violation(s), pursuant to Title 18, United States Code, Section 982(a)(2)(A).

The allegations contained in Counts Three and Four of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code,

Sections 982(a)(2)(B) and 1028(b)(5). Upon conviction of the offense(s) charged in Counts Three and Four of this Information, in violation of Title 18, United States Code, Section 1028(a)(7), defendant shall forfeit to the United States any property which constitutes or is derived from proceeds obtained directly or indirectly, as a result of such violation(s) and any personal property used or intended to be used to commit the offense, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5).

Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code,

Section 2461, to seek to forfeit any other property of defendant up to the value of the forfeitable property described above.

Money Judgment: Upon conviction of violating 18, United States Code, Section 1344, defendant shall be ordered to pay the United States a sum of money equal to the total amount of proceeds defendant obtained as a result of such violation(s).

DAWN N. ISON  
United States Attorney

/s/ John K. Neal  
John K. Neal  
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/s/ Alyse Wu  
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Dated: March 14, 2023

<b>United States District Court Eastern District of Michigan</b>	<b>Criminal Case Cover Sheet</b>	Case Number:
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials: s/AW</b>

**Case Title:** USA v. Damond Strong

**County where offense occurred:** Oakland

**Offense Type:** Felony

Information – no prior complaint.

### Superseding Case Information

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

**Reason:**

**Defendant Name**

**Charges**

**Prior Complaint (if applicable)**

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**

March 14, 2023

Date

s/ Alyse Wu

Alyse Wu  
Assistant United States Attorney  
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Detroit, MI 48226  
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(313) 226-9589

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.